



MARIN CONSERVATION LEAGUE

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June 24, 1998

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Lester Snow, Executive Director
CALFED Bay-Delta Program
1416 Ninth Street, Suite 1155
Sacramento, CA 95814

Re: Draft EIR/EIS Comments

Dear Mr. Snow:

The Marin Conservation League has a 64-year history of preserving Marin County land and water, including San Pablo Bay. Many square miles of the Bay lie within the County boundary. MCL has an equally long record of positions and actions aimed at preservation of Bay wetlands, marshes, shoreline and tidewaters. Thus, on behalf of thousands of members, we have a vital interest in what CALFED's Bay-Delta Program proposes to do with the San Pablo, as well as the San Francisco and Suisun Bays. We, therefore, appreciate the opportunity to comment upon the Draft Environmental Impact Report/Statement.

We have serious concerns about whether the EIR and the Ecosystem Restoration Plan will accomplish rehabilitation of the Estuary and provide the water supply and water quality needs for urban and agricultural users. The Draft EIR/S contains little discussion of restoring freshwater for estuary resources (i.e., fish, birds, invertebrates and plants). The impacts of the loss of freshwater flows on many estuary functions, including sediment transport, sediment deposition and the change in primary productivity with relocation of the null zone, have been overlooked. Further, there is no discussion of ensuring sufficient flows to sustain the fresh/brackish characteristics of Suisun and San Pablo Bays. Apparently, the only means to secure water for the estuary, as contemplated by the EIR, is from the purchase of water from willing sellers. There are no seasonal wetland restoration goals for the North Bay, and restoration in the rest of San Francisco Bay is not even addressed. Furthermore, the restoration acreage goals for the North Bay and Suisun are too few. Without a sufficient quantity of freshwater, these bays may gradually convert to salt marshes.

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We urge CALFED to broaden its consideration of alternatives to include the Integrated Floodplain Management concept (i.e., more bypasses, decentralized facilities, such as weirs and levees -- no new dams, reservoirs or peripheral canal). This new Bay-Delta management model that integrates flood management, water supply planning and environmental restoration is available to CALFED. This concept has considerable potential to emulate natural processes in the Bay-Delta watershed. It could restore riparian and seasonal wetland habitat, increase groundwater recharge and restore riverine baseflows. This concept also calls for increasing reservoir yield by altering the operation of existing storage facilities, improving instream flows and water quality and reducing the frequency of flood risk to Delta levees, all within a cost-effective framework of

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economic incentives. Integrated Floodplain Management offers major benefits to all stakeholder groups in the Bay-Delta proceedings and is consistent with overall CALFED objectives. There is evidence to demonstrate that it will work. CALFED is an excellent vehicle for combining all agencies to develop a workable solution. For detailed information, please contact James Fryer at 415/332-2809 or j-fryer@ix.netcom.com.

Conservation measures currently proposed in the Draft EIR/S are minimal. CALFED must study an alternative that demands: a) further reduction of wasteful water use by cities (urban landscapes, swimming pools) and farms; b) retirement of more salt-soaked agricultural land on the west side of the San Joaquin Valley; c) improved groundwater management; d) increased recycling and reclamation; e) maximum water conservation measures; adequate freshwater for estuary resources and restored pattern of flows; mechanisms to secure water for these resources; sufficient freshwater to maintain fresh and brackish marshes in San Pablo and Suisun Bays and restoration goals for the North Bay and the entire San Francisco Bay.

In addition, it is totally unacceptable to exclude the Trinity from this solution process. The Trinity River has contributed more than one million acre feet of water annually to the San Francisco Bay-Delta for 34 years, yet the Trinity Basin has been OMITTED from all CALFED project area maps and funding.

The worst action CALFED can take would be to select Alternative 3. After spending billions of dollars to implement the Common Program for environmental restoration, multi-billions would be spent to build the Peripheral Canal, giant reservoirs and other facilities to export ever-increasing trillions of gallons of water out of the Bay-Delta. The restored ecosystem would lose the very water essential to its survival. Excessive export of water from the Bay-Delta would continue to cause environmental ruin and economic hardship for Northern California. To put it plainly, *CALFED will never reach the consensus it needs while there is a Peripheral Canal proposed in any Alternative.*

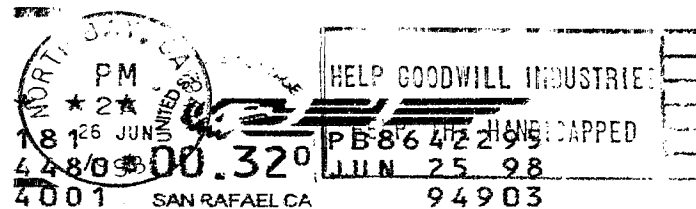
MCL and its membership hope that CALFED will carefully consider and respond to our concerns. We will continue to advocate our positions directly and through the Environmental Water Caucus during Phase III.

Sincerely,


Kathy Lowrey
President



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